

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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SHANNAN ELLIS, RICH FREIBERG,  
CHRISTOPHER ROY, and STEPHEN  
RIES, individually and on behalf of all others  
similarly situated,

Plaintiff,

vs.

HUB INTERNATIONAL LIMITED,

Defendant.

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Hon. John J. Tharp Jr.

Master File No. 1:23-CV-06137

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**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, EXPENSES, AND CLASS  
REPRESENTATIVE SERVICE AWARDS**

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PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Attorneys' Fees, Expenses, and Class Representative Service Awards, the Declaration of Class Counsel in Support of Plaintiffs' Motion for Approval of Attorneys' Fees, Costs, and Service Awards, and all prior pleadings and proceedings had herein, Plaintiffs Shannan Ellis, Rich Freiberg, Christopher Roy, and Stephen Ries (collectively, "Plaintiffs") move for an Order approving Plaintiffs' request for: (1) attorneys' fees equivalent to one-third of the net Settlement Fund (*i.e.*, \$1,345,018.00); (2) reimbursement of \$15,172.93 in litigation expenses; and (3) Class Representative Service Awards in the amount of \$3,500.00 to each Class Representative (\$14,000.00 in total).

Date: July 25, 2025

Respectfully Submitted,

By: /s/Tyler J. Bean

Tyler J. Bean

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*Settlement Class Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 25, 2025, I electronically filed the foregoing document using the Court's electronic filing system, which will notify all counsel of record authorized to receive such filings.

/s/Tyler J. Bean

Tyler J. Bean